

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

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| _____ |) | |
| In re: |) | |
| |) | |
| NATALY MINKINA, |) | CHAPTER 13 |
| |) | CASE NO. 18-13325-FJB |
| Debtor |) | |
| _____ |) | |

MOTION TO CONTINUE HEARINGS SET FOR MAY 24, 2019 AT 9:30 A.M.

COMES NOW, the Debtor Nataly Minkina (the “Debtor”) and moves the Court for an order continuing the hearings set for May 24, 2019 relating to: Docket Number 144 Trustee’s Objection to Confirmation of Plan, Docket Number 79 Objection to Debtor’s Claim of Exemption¹, and Docket Number 147 Motion to Avoid Judicial Lien (hereinafter collectively the “Motions”). In support of such Motion, the Debtor states the following:

1. By Orders dated April 12, 2019 the Court set a hearing on the Motions for Friday, May 24, 2019 at 9:30 a.m. (hereinafter the “Hearing”).
2. Counsel for the Debtor is currently on day ten of a jury trial in the United States District Court for the District of Connecticut. It is now anticipated that the trial will not be completed before May 24, 2019, therefore making undersigned counsel unavailable for the Hearing. It is expected that the

¹ The Debtor hereby stipulates that her homestead exemption cannot exceed \$500,000, therefore, the objection to her claimed exemption may be sustained to the extent it exceeds \$500,000. Nothing herein shall be deemed to waive the Debtor’s claim that her interest in her homestead does not exceed \$500,000 in value above liens, or that the Trustee or any creditor may take possession or sell the property itself without the consent of her husband during while their tenancy by the entirety remains unsevered.

pending trial will be completed sometime during the week May 27th. Therefore a continuance to a date on or after June 3, 2019 is requested.²

3. Counsel for the Rogers, Powers & Schwartz (“RPS”) has indicated that RPS does not oppose this Motion. A request for assent or statement of no opposition to counsel for the Trustee on Friday, May 16, 2019 has not yet received a response.
4. No prior requests for a continuance of the Hearing have been requested, this motion is not intended to delay or prejudice any party.

NATALY MINKINA

By her attorney,

/s/ Ryan D. Sullivan
Ryan D. Sullivan (BBO#660696)
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Dated: May 19, 2019

CERTIFICATE OF SERVICE

I, Ryan D. Sullivan hereby certify that on this 19th day of May, 2019, I caused a true and accurate copy of the foregoing to be served upon all counsel of record via ECF.

/S/ Ryan D. Sullivan

² Counsel is also scheduled for a jury trial in Middlesex Superior Court beginning on June 19, 2019 and likely continuing until June 25, 2019. Trial days, however, conclude at 1 p.m., therefore a hearing after 2:30 p.m. would be allow sufficient time to conclude and travel into Boston.